

# **EXHIBIT A**

**BRACH EICHLER LLC**

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Attorneys for Defendants

RICHARD M. ZELMA,

Respondent,

v.

MICHAEL PETER HALPERIN,  
INDIVIDUALLY, AS OWNER,  
MANAGER, FOUNDER, AND  
DIRECTOR OF HFA HOLDINGS  
LLP, D/B/A, IP HORIZON INC.,

AND

MICHAEL PETER HALPERIN,  
D/B/A HFA HOLDINGS)  
LLP, A/K/A, D/B/A IP HORIZON  
INC., SKYETEL, CALL 48,  
MHLHTH HOLDINGS LLC, AND  
ALL HALPERIN'S CURRENTLY  
UNKNOWN SHELL COMPANIES,

AND

DOE TELEMARKETERS (1-20),  
ABC CORPORATIONS' (1-20),  
RESELLERS, CALL-CENTERS,  
WORKING WITH, BENEFITING  
FROM, PARTICIPATING IN,  
AFFILIATED OR DOING BUSINESS  
WITH THE NAMED DEFENDANTS;  
EACH ACTING INDIVIDUALLY, IN  
CONCERT OR AS A GROUP,

Defendants.

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION: BERGEN COUNTY  
DOCKET NO.: BER-L-5354-23

Civil Action

**NOTICE OF FILING OF NOTICE OF REMOVAL**

**TO: The Honorable Judge Peter G. Geiger of the Superior Court of New Jersey, Bergen County Justice Center, Civil Division, and to all Parties:**

Pursuant to 28 U.S.C. § 1331, 1441, and 1446, Defendants Michael Peter Halperin, HFA Holdings LLC,<sup>1</sup> IP Horizon LLC,<sup>2</sup> Skye Telecom LLC d/b/a SkyeTel,<sup>3</sup> HFA Services LLC d/b/a Call 48,<sup>4</sup> and MHLHTH Holdings LLC, hereby provide notice that on February 23, 2024, they have filed a Notice of Removal of this action to the United States District Court for the District of New Jersey. A true and correct copy of the Notice of Removal is attached hereto as **Exhibit A**. The state court action shall proceed no further unless and until remanded in accordance with 28 U.S.C. § 1446(d).

[Signature follows on the next page.]

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<sup>1</sup> “HFA Holdings LLC,” not “HFA Holdings LLP,” is its proper legal name. *See* sunbiz.org, <https://search.sunbiz.org/Inquiry/CorporationSearch/SearchResultDetail?inquirytype=EntityName&directionType=Initial&searchNameOrder=HFAHOLDINGS%20L190001341750&aggregateId=flal-119000134175-9a9d09c3-7cc6-4403-9843-d88213342627&searchTerm=HFA%20Holdings&listNameOrder=HFAHOLDINGS%20L190001341750> (last visited Feb. 20, 2024).

<sup>2</sup> “IP Horizon LLC,” not “IP Horizon Inc.,” is its proper legal name. *See* sunbiz.org, <https://search.sunbiz.org/Inquiry/CorporationSearch/SearchResultDetail?inquirytype=EntityName&directionType=Initial&searchNameOrder=IPHORIZON%20L180000258120&aggregateId=flal-118000025812-05d5b9a5-774e-471f-99fe-c59eac73a356&searchTerm=IP%20Horizon&listNameOrder=IPHORIZON%20L180000258120> (last visited Feb. 20, 2024).

<sup>3</sup> “SkyeTel” is a d/b/a of Skye Telecom LLC. *See* FCC Form 499 Filer Database, <https://apps.fcc.gov/cgb/form499/499detail.cfm?FilerNum=831772> (last visited Feb. 20, 2024).

<sup>4</sup> “Call48” is a d/b/a of HFA Services LLC. *See* sunbiz.org, <https://dos.sunbiz.org/scripts/ficidet.exe?action=DETREG&docnum=G19000119854&rdocnum=G19000116369> (last visited Feb. 20, 2024).

**BRACH EICHLER LLC**

/s/ Bob Kasolas

Bob Kasolas, Esq.

Mark E. Critchley, Esq.

*Attorneys for Defendants*

Dated: February 23, 2024

**CERTIFICATE OF SERVICE**

I hereby certify that on this 23rd day of February, 2024, I caused a copy of the foregoing document to be served upon Plaintiff, via first class mail, postage prepaid, and email, as follows:

Richard Zelma  
940 Blanch Avenue  
Norwood, New Jersey 07648  
[TCPALAW@optimum.net](mailto:TCPALAW@optimum.net)

*Plaintiff Pro Se*

/s/ Bob Kasolas  
Bob Kasolas, Esq.

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